

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

LG Philips LCD Co.,)	
Plaintiff,)	
v.)	C A. No.: 04-343-JJF
Tatung Co., Tatung Company of America Inc.,)	JURY TRIAL DEMANDED
and Viewsonic Corp.)	
)	
Defendants.)	

**DEFENDANT TATUNG COMPANY OF AMERICA, INC.'S RESPONSES TO
PLAINTIFF'S SECOND SET OF INTERROGATORIES**

Defendant Tatung Company of America Inc. ("TATUNG USA"), by and through its attorneys Greenberg Traurig, LLP, hereby makes its Objections and Responses to the Plaintiff's Second Set of Interrogatories as follows:

PRELIMINARY STATEMENT

TATUNG USA has not yet completed its gathering of facts and documents related to this action. Therefore, in responding to the Interrogatories, TATUNG USA reserves the right to revise, correct, add to, supplement, and clarify any of its responses.

All responses are submitted as presently advised, and without prejudice to TATUNG USA's right to modify, amend, revise, correct, supplement, add to or clarify such responses at the appropriate time.

Counsel for TATUNG USA invites discussion with counsel for Plaintiff with respect to these responses, with the expectation that discussions between counsel may eliminate or modify objections, reduce burdens on TATUNG USA, or otherwise result in a mutually satisfactory resolution of the objections set forth herein.

GENERAL OBJECTIONS

TATUNG USA hereby makes the following general objections to all of the individual Interrogatories. These general objections are incorporated into each and every Interrogatory set forth below, whether referenced specifically or not.

1. TATUNG USA hereby interposes the following general objections to all of the individual Interrogatories contained in Plaintiff's Interrogatories. These general objections are incorporated into each and every individual objection set forth below, whether referenced specifically or not.

2. TATUNG USA specifically objects to Plaintiff's Second Set of Interrogatories on the grounds that such Interrogatories are overly broad and unduly burdensome, and/or because it Interrogatories documents that are neither relevant to the subject matter of this proceeding nor reasonably calculated to lead to the discovery of admissible evidence.

3. TATUNG USA objects to the Interrogatories to the extent they seek information or documents that are protected from disclosure by the attorney-client privilege or other privilege, or by the work-product doctrine. Such information or documents will not be produced to Plaintiffs and any inadvertent production shall not be deemed a waiver of any privilege with respect to the information or any work product doctrine which may apply.

4. TATUNG USA objects to the Interrogatories to the extent they attempt to impose duties that are beyond the scope of the Federal Rules of Civil Procedure and the Local Rules of this Court.

5. TATUNG USA objects to the Interrogatories on the grounds that they are not limited by time, and, therefore, are in many instances overly broad and unduly burdensome,

and/or Interrogatory documents that are neither relevant to the claims and defenses of this proceeding nor reasonably calculated to lead to the discovery of admissible evidence.

6. TATUNG USA objects to the Interrogatories as to the requested time, place, and manner. It is not currently possible to accurately gauge the quantity of documents requested. To the extent that there are properly producible documents, they will be produced at a mutually agreed upon time, place, and manner.

7. TATUNG USA objects to the Interrogatories to the extent that they seek materials obtained or prepared in anticipation of litigation or trial, materials prepared by or for an attorney, materials protected by a state or federal right of privacy or protection, materials protected from disclosure under relevant procedural rules or case law, and further seek mental impressions, conclusions, opinion, or legal theories concerning anticipated or actual litigation.

8. TATUNG USA objects to the Interrogatories on the grounds that they seek information that is more readily and efficiently obtained through deposition questions rather than written discovery.

9. TATUNG USA objects to the Interrogatories on the grounds that they seek information that is readily accessible to Plaintiffs from public sources or Plaintiff's own files.

10. TATUNG USA objects to the Interrogatories on the grounds and to the extent that they call for disclosure of proprietary or confidential information or trade secrets, disclosure of which would be prejudicial to TATUNG USA, its customers, suppliers, and any witnesses testifying on behalf of TATUNG USA, the clients of such witness, or the person or persons who provided such information to TATUNG USA. Any such information that TATUNG USA provides will be provided subject to the stipulated Protective Order entered into by the parties in this proceeding.

11. TATUNG USA objects to the Interrogatories to the extent that they seek information that, if furnished, would violate a court order, protective order, and/or stipulation of confidentiality that has been entered with respect to such information.

12. TATUNG USA objects to the Interrogatories to the extent that they call for disclosure of proprietary or confidential information of a third party, or the joint proprietary or confidential information of TATUNG USA and the third party. TATUNG USA will not provide such information until the third party has been notified of such Requests, and the third party has consented to the production of such requested information.

13. TATUNG USA objects to the Interrogatories to the extent that they seek copyrighted material or other information, the copyright, or other intellectual property rights, access to which TATUNG USA does not possess.

14. TATUNG USA objects to the Interrogatories as premature to the extent that they seek disclosure of witnesses, evidence and theories to be presented by TATUNG USA at the trial of this action before TATUNG USA has had an opportunity to obtain discovery.

TATUNG USA objects to the Interrogatories on the grounds and to the extent that responding to such Interrogatories would improperly require TATUNG USA or its witnesses, or both, to perform studies, analyses, calculations or compilations that do not currently exist.

SPECIFIC RESPONSES AND OBJECTIONS TO THE INTERROGATORIES

Subject to the general objections, TATUNG USA makes the following specific objections and responses:

Interrogatory No. 1.

Identify each person who prepared or otherwise assisted in the preparation of your responses to these interrogatories.

Response:

TATUNG USA specifically objects to this Interrogatory to the extent it seeks information that is protected by the attorney-client privilege and/or the work product doctrine, or that is otherwise privileged and protected from disclosure.

Subject to and without waiver of the general and specific objections, TATUNG USA states that Peter Farzin and Mike Lee assisted in preparing these responses.

Interrogatory No. 2.

Identify each type of visual display product (such as the Tatung L17AMTN monitor) manufactured, shipped, imported, sold, and/or offered for sale, by or for you, since January 1, 2002, and specify which products have been marketed or sold under a trademark or brand name that belongs to Tatung Co. or its affiliated entities.

Response:

TATUNG USA specifically objects to this Request on the grounds that the vague and ambiguous phrase, "type of visual display product," and "L17AMTN"¹ renders it overbroad and unduly burdensome. TATUNG USA also objects to this Request on the grounds that it is not limited to the U.S. market and, therefore, seeks information which is not relevant to the claims or defenses of this lawsuit and is not reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiver of the general and specific objections, TATUNG USA states that, based upon information and belief, the following Tatung LCD computer monitors have been shipped, imported, sold, or offered for sale in the United States since January 1, 2002:

¹ Please note that TATUNG USA manufactures various different models of the Tatung L17AMTN, the accused product: L17AMTN; L17AMTNB-U32 AD; L17AMTN-KM21L; L17AMTN-KM21L01; L17AMTN-SR17" LCD MONITOR; L17AMTN-K; L17AMTN-K01; L17AMTN-KE21AB; L17AMTN-KE51AB; L17AMTN-KM21L02; L17AMTN-KM51 which will be referred to in this responses collectively as "L17AMTN".

ADMNLC27	L19SD25M21LB	L5CESPP-U62	LT15A
ADMNLC230	L19SD25M51LA2	L5CES-R21L	LT15A-G
ADMNPLASMA42	L19YA25A	L5CTS	LT15A-K
ADMNPLASMA46	L19YD25E21AB	L5CTSB-U32 AD	LT17A
ADMNPLASMA50	L19YD25E51AB	L5CTSB-U52 AD	LT17A-KF
DMAV-2701	L37LD50A	L5CTSB-U62 AD	LT17A-KT21LF
DMAV-3201	L40SA50	L5CTSB-U82 AD	LT19A
DTV-29XRT	L5CDS	L5CTSB-U82 AD	P42BSMT
LS64PA30A1	L5CDS-A21A	L5CTSB-U82 AD	P42BSMT-S
L10PA35A	L5CDS-A21P	L5CTSDP-U01	P42HSKH-UA1
L10PA35M21LA	L5CDS-A51A	L5CTS-K	P42HSKT
L10PC35A	L5CDS-A51P	L5CTS-KA20A01	P42HSMT
L15CA25E21AJ01	L5CDSB-A21A	L5CTS-KA21A	P42HSMT-AMF
L15CA25E-U01	L5CDSB-A21P	L5CTS-KA50A	P42HSMT-T
L15CA25H1	L5CDSB-A51A	L5CTS-KA51A	P46CCWV
L15CA25H101	L5CDSB-A51P	L5CTS-KC21L	P46D
L15CA25M21LK	L5CDSB-E21A	L5CTS-KE21A	P46T
L15CA25M21LL	L5CDSB-E21P	L5CTS-KM21L	P50BSAT
L15CA25P21AH1	L5CDSB-HA21A	L5CTS-KM51L	P50BSAT-T
L15CC25H	L5CDSB-HM21L	L5CTS-R21L	PD42E
L15CCATB DETEL	L5CDSB-M21L	L5KAS	PD42H
L15CCAT-U01	L5CDS-CLI	L5KAS1-A21A	PD46WV1
L15MA25T21LA	L5CDS-E21A	L5KAS1-M21L	PT12G
L15RA25-K01	L5CDSH-M21L	L5KATSK1-M21L	PT12G-A21A
L15RA25M21LA	L5CDSK	L5MA25A	PT12G-A21P
L15RA25M21LA1	L5CDSK-A21P	L5MA25E21AJ	PT12G-A51A
L15RA25M21LX	L5CDSK-M21L	L5MA25M21LA	PT12G-C21L
L15RA25T21LA	L5CDSKM21LB	L5RA25A	PT12G-M21L
L17ACTNB-U32 AD	L5CDSKM21LB-B	L5RA25E21AJ	PT12W
L17ACTNB-UD2 AD	L5CDSKM21LD	L5RA25E21AJ01	PT12W-A21A
L17ACTN-KM21L	L5CDSKM51L	L5RA25E51AJ01	PT12W-A21P
L17ACTN-U01	L5CDSKM51LBZ	L5RA25J	PT12W-A51P
L17AMTN	L5CDSKR-A21P	L5RA25-K	PT12WK
L17AMTNB-U32 AD	L5CDSKR-A51A	L5RA25M21LA	PT12WK-A21A
L17AMTN-K	L5CDSKR-A51P	L5RA25M21LA01	PT12WK-A21P
L17AMTN-K01	L5CDSKRH01	L5RA25M21LA1	PT12WK-M21L
L17AMTN-KE21AB	L5CDSKRH-A21A	L5RA25M51LK	V17AFTW
L17AMTN-KE51AB	L5CDSKRH-A21P	L5VHT	V17AFTW-D
L17AMTN-KM21L	L5CDS-M21L	L64PA30A	V17AFTW-G
L17AMTN-KM21L01	L5CDS-M51L	L64PA30A2	V17AFTW-K
L17AMTN-KM51L	L5CDS-U31	L64PA30A21AA	V23CLTT
L17AMTN-SR	L5CDS-U32	L64PA30A51AA	V27CLTT-U01
L17CA25A	L5CDS-U72	L7CESK	V27CMTT
L17CA25A01	L5CDS-U82	L7CMS	V30CLTT-U01
L17CA25B	L5CES	L7CMS-A21A	V30CMTT

L17CA25E21AA	L5CES-A21A	L7CMS-A51A	V30CMTT-KA
L17CA25M01LB	L5CES-A21P	L7CMSB	V30CMTT-KA01
L17CA25M21LB	L5CES-A51A	L7CMSB-A21A	V32FCBB-U01
L17CA25M21LD01	L5CESB	L7CMSB-A31A	V32FLBB-U02
L17CA25T21LD	L5CESB01	L7CMSB-E21A	VT10C
L17CA30A	L5CESB02	L7CMSB-HA21A	VT10CI-K
L17CA30M21LB2	L5CESB-A01A	L7CMSB-HA51A	VT10S
L17CA30T21LA	L5CESB-A21A	L7CMSB-HE21A	VT10SI
L17HP25E01A	L5CESB-A21P	L7CMSB-HM01L	VT10S-K
L17HP25E51A	L5CESB-A31A	L7CMSB-HM21L	VT10S-KA21A
L17SA25A	L5CESB-A51A	L7CMSB-HM51L	VT10S-KG
L17SA30M21LE-U0	L5CESB-A51P	L7CMSB-M21L	VT10S-KT21L
L17SA30T21LD	L5CESB-C21L	L7CMSB-M51L	VT12C
L17SX25A	L5CESB-C51L	L7CMS-E21A	VT12C-K
L19CMATB-U32 AD	L5CESB-E21A	L7CMSH-A21A	VT12C-KM21L
L19LA25M21LB	L5CESB-E21P	L7CMSH-E21A	VT12S
L19LA25M21LC01	L5CESB-E51A	L7CMSH-M21L	VT12S01
L19LA25M21LC02	L5CESB-E51P	L7CMSK	VT12SI
L19LA25M21LC03	L5CESB-HA21A	L7CMSKM21L	VT12SI-KA21A
L19LD25A11	L5CESBH-A21A	L7CMS-M21L	VT12SI-MAY
L19MA25A	L5CESBH-A21A-MS	L7CMS-M51L	VT12SI-MAY01
L19MA25A01	L5CESBH-A51A	L7CMS-U42	VT12SI-TEK
L19MA25A02	L5CESBH-C21L	LD23HL	VT12SI-TUS
L19MA25A03	L5CESBH-C21L-MS	LD23HL01	VT12S-K
L19MA25A04	L5CESBH-C51L	LD23HL01-K	VT12S-KA21A
L19MA25A05	L5CESB-HM21L	LD23HL-K	VT12S-KA51A
L19MA25A06	L5CESBH-M51L	LD30HL	VT12S-KM01L
L19MA25A51AA	L5CESB-M21L	LD32HL	VT12S-KM21L
L19MA25C01	L5CESB-M51L	LK152FPE21A	VT12S-KM21L01
L19MA25E21AB	L5CESB-U32 DETE	LK152FPE21P	VT12S-KM51L
VT15TI	VT17SH-A51A	VT17SI	VT17T-A51A-SPCM
VT15TI-A21A	VT17SH-C21L	VT17S-K	VT17TI
VT15TI-A21A-SP	VT17SH-C21L-MSR	VT17SRB	VT17TI-A21A
VT15TI-A21A-SPC	VT17SH-C51L	VT17SRI	VT17TI-A21A-SP
L5CESPP-U61	VT17SH-E21A	VT17T	VT17TI-A21A-SPC
VT17S	VT17SH-M21L	VT17T-A21A	VT17TI-A51A-SPC
VT17SH-A21A	VT17SH-M51L	VT17T-A21A-SP	VT15T-A51A-SPCM
VT17T-A21A-SPCM	VT17SHV-A21A	VT17T-A21A-SPC	L19SD25E51AB01
VT17T-A51A-SPC			
L19MA25GC	L5CES-C21L	LK152FR	VT12S-TUS
L19MA25M21LA	L5CESDP-E82	LK152FRA21A	VT12SU
L19MA25M21LA01	L5CES-E21A	LK152FRA51A	VT12SU-A51A01
L19MA25M21LA02	L5CES-HA21A	LK152FRM21L	VT12T
L19MA25M21LA03	L5CESH-A51A	LK152FRM51L	VT12T-A21A
L19MA25M21LA04	L5CES-HM21L	LK171FP-A21A	VT12TI-A21A

L19MA25M21LB	L5CESK	LK171FP-E21A	VT15GT-A21A-SPC
L19MA25M21LC	L5CESKA21A	LK171FP-M21L	VT15S
L19MA25M21LC01	L5CESK-E21A	LK171FR	VT15S
L19MA25M21LC02	L5CESKM21L	LK171FRA21A	VT15S01
L19MA25M51LA	L5CES-KM21L2	LK171FRG	VT15S-A51A
L19MA30A21AA	L5CESKM21LE	LK171FRM51L	VT15SI
L19MD25E21AB	L5CESKM21LE01	LK192FR	VT15SRB
L19MD25E51AB	L5CESKM21LE02	LQ121-LH03-INV	VT15SRI
L19MD25M21LB	L5CESKM51L	LS15CA25G	VT15T
L19SA25E21AB	L5CES-KR21L	LS15CC25	VT15T-A21A
L19SA25M21LB	L5CESKR-A51A	LS15CC25H	VT15T-A21A-MSR
L19SA25M21LB01	L5CESKRH-A21A	LS15FA25F	VT15T-A21A-SP
L19SA25M21LC01	L5CES-M21L	LS18CA35E21A	VT15T-A21A-SPC
L19SA25M21LC03	L5CES-M51L	LS18CA35M21L	VT15T-A21A-SPCM
L19SD25A2	L5CESPP-A21P	LS18CA35M21LA	VT15T-A21A-SPM
L19SD25E21AB	L5CESPPKA21P	LS18CA35M21LT	VT15T-A51A
L19SD25E21AB01	L5CESPP-U41	LS64PA30	VT15T-A51A-MSR
L19SD25E51AB	L5CESPP-U42	LS64PA30A	VT15T-A51A-SPC

Interrogatory No. 3.

Identify each type of visual display product (such as the Tatung L17AMTN monitor) manufactured, shipped, imported, sold, and/or offered for sale, in or to the United States, by or for you, since January 1, 2002.

Response:

TATUNG USA specifically objects to this Request on the grounds that the phrase, "type of visual display product," is vague and ambiguous terms," renders it overbroad and unduly burdensome. TATUNG USA also objects to this Request on the grounds that it is not limited to the U.S. market and, therefore, seeks information which is not relevant to the claims or defenses of this lawsuit and is not reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiver of the general and specific objections, TATUNG USA refers Plaintiff to the Response to Interrogatory No. 2.

Interrogatory No. 4.

State the date that you first became aware of each of the Patents-In-Suit and describe in detail the circumstances surrounding your first knowledge of each of the Patents-In-Suit, including, but not limited to, identifying the person at Tatung who first learned of each of the Patents-In-Suit and from what source, explaining the manner in which that person learned of the Patents-In-Suit, and identifying all documents that reflect when and how you learned of the Patents-In-Suit.

Response:

TATUNG USA specifically objects to this Interrogatory to the extent it seeks information that is protected by the attorney-client privilege and/or the work product doctrine, or that is otherwise privileged and protected from disclosure.

Subject to and without waiver of the general and specific objections, TATUNG USA responds that it first became aware of each of the Patents-In-Suit when it was served with Plaintiff's Complaint in this action on or about May 28, 2004.

Interrogatory No. 5.

Describe in detail any and all efforts made by you, or on your behalf, to avoid infringing the Patents-In-Suit since the time that you first learned of either of the Patents-In-Suit.

Response:

TATUNG USA specifically objects to this Interrogatory on the grounds that it is overbroad and unduly burdensome. TATUNG USA further objects to this Interrogatory to the extent it seeks documents that are protected by the attorney-client privilege and/or the work product doctrine, or that are otherwise privileged and protected from disclosure. TATUNG USA also objects to this Interrogatory on the grounds that it seeks information which is not relevant to the claims or defenses of this lawsuit and is not reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiver of the general and specific objections, TATUNG USA states that it has not and does not infringe the Patents-In-Suit. Discovery is continuing and TATUNG USA reserves the right to supplement this response.

Interrogatory No. 6.

State whether you intend to rely on any legal opinion or advice as part of your defense concerning the scope, validity, enforceability, or infringement of any of the Patents-In-Suit, and, if so, identify each legal opinion, including whether it is written or oral, the author(s), recipient(s), date, and subject matter regarding each opinion, and identify all facts and documents considered for purposes of each opinion.

Response:

TATUNG USA specifically objects to this Interrogatory to the extent it seeks information that is protected by the attorney-client privilege and/or the work product doctrine, or that is otherwise privileged and protected from disclosure.

Subject to and without waiver of the general and specific objections, TATUNG USA responds that it has not yet finally determined which defenses it will pursue, including without limitation, whether it will rely on advice of counsel as a defense to Plaintiff's claims. TATUNG USA will make this determination in accordance with the directions and schedule set by the Court. TATUNG USA does intend to rely on the written judgment of His Honour Judge Fysh QC, Patents County Court, United Kingdom, which was entered on November 28, 2005 in the case of LG.Philips LCD Co., Ltd. (Claimant) and (1) Tatung (U.K.) Ltd., (2) ViewSonic Europe Ltd., and (3) Number One Services Ltd. (Defendants), Case No. PAT04022. The subject matter of the judgment was a finding that Tatung (U.K.) Ltd.'s CCTV did not infringe LG's UK Patent No. 2 346 464 (as it was proposed to be amended), the foreign counterpart to the Patents-In-Suit; that the Patent (as proposed to be amended) was invalid over the prior art references of US Pat. No. 5,570,267 (Ma), U.S. Pat. No. 5,119,204 (Hashimoto), JP 09-190156 (Fujitsu '156), JP 09-

171358 (Fujitsu '358); and that the Patent as granted is revoked. The facts and documents considered for this judgment include everything filed in the case and the testimony and evidence presented at trial.

Interrogatory No. 7.

Identify each investigation concerning the Patents-In-Suit undertaken by you or on your behalf (including, for example, prior art searches, tests, or analysis related to patent scope, validity, and/or infringement) and describe in detail each such investigation, including the date(s), the person(s) involved, the scope of the investigation, the results and conclusions of the investigation, and identify all documents used or created concerning the investigation.

Response:

TATUNG USA specifically objects to this Interrogatory on the grounds that it prematurely seeks expert discovery. TATUNG USA further objects to this Interrogatory on the grounds that it is overbroad and unduly burdensome. TATUNG USA also objects to this Interrogatory to the extent it seeks information that is protected by the attorney-client privilege and/or the work product doctrine, or that is otherwise privileged and protected from disclosure. Finally, TATUNG USA objects on the grounds that this Interrogatory seeks information which is not relevant to the claims or defenses of this lawsuit, and which is not reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiver of the general and specific objections, TATUNG USA refers Plaintiff to the prior art that co-defendant TATUNG has already produced and made available for inspection in this case. TATUNG USA further asserts that the burden of deriving or ascertaining the answer is substantially the same for both Plaintiff and TATUNG USA and, pursuant to Fed. R. Civ. P. Rule 33(d), will provide the following records from which the answer may be derived or ascertained: TDE-000095-000168. The remainder of this Interrogatory seeks information that is privileged and/or seeks a premature disclosure of expert testimony.

TATUNG USA will disclose its expert reports in accordance with the directions and schedule set by the Court. Discovery is continuing and TATUNG USA reserves the right to supplement this response.

Interrogatory No. 8.

If you contend that any claim of the Patents-In-Suit is invalid for any reason (including, for example, under 35 U.S.C. §§ 101, 102, 103, and 112), then as to each such claim and patent, set forth in detail the entire basis for your contention, including stating all relevant facts, identifying all documents on which you rely to support your contention, and identifying all persons with information or knowledge relevant to your contention, summarizing each person's knowledge.

Response:

TATUNG USA specifically objects to this Interrogatory on the grounds that it prematurely seeks expert discovery. TATUNG USA further objects to this Interrogatory on the grounds that it is overbroad and unduly burdensome. TATUNG USA also objects to this Interrogatory to the extent it seeks information that is protected by the attorney-client privilege and/or the work product doctrine, or that is otherwise privileged and protected from disclosure. Finally, TATUNG USA objects on the grounds that this Interrogatory seeks information which is not relevant to the claims or defenses of this lawsuit, and which is not reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiver of the general and specific objections, TATUNG USA will provide a complete response to this Interrogatory as part of the disclosure of its expert reports in accordance with the directions and schedule set by the Court. TATUNG USA presently believes that the response to this Interrogatory includes the information contained in TATUNG USA's responses to Interrogatory Nos. 7, 10 and 11 and, at a minimum, the following:

Facts: TATUNG USA responds on information and belief that information responsive to this Interrogatory is in co-defendant Viewsonic's Opposition to Plaintiff's Motion for

Preliminary Injunction, its Request to File Sur-Reply, and the supporting Declarations and Exhibits. Additional facts responsive to this Interrogatory are set forth in the deposition transcript of William Bohannon, taken August 6, 2004; the deposition transcript of Mark Brinkerhoff, taken January 20, 2005; the witness statements of Nicholas Talesfore dated August 11, 2005 and September 14, 2005; the witness statements of Mark Brinkerhoff dated July 29, 2005 and September 6, 2005, the witness statement of Stuart Morgan dated July 20, 2005; the testimony of Nicholas Talesfore given on September 15 and 16, 2005 in the UK Patents County Court Case No. PAT04022; the testimony of Mark Brinkerhoff given on September 19, 2005 in the UK Patents County Court Case No. PAT04022; the testimony of Stuart Morgan given on September 20, 2005 in the UK Patents County Court Case No. PAT04022; the facts contained in the March 7, 2005 draft amended Particulars of Infringement in the UK Patents County Court Case No. PAT04022. Facts contained in the March 22, 2005 - Amended Particulars of Infringement in the UK Patents County Court Case No. PAT04022. Facts contained in the August 11 2005 Re-Amended Particulars of Infringement in the UK Patents County Court Case No. PAT04022. The transcripts and exhibits from the trial held in the UK Patents County Court Case No. PAT04022 on September 15, 16, 19-22, 2005; and the Judgment rendered on November 28, 2005 in the UK Patents County Court Case No. PAT04022.

Documents: The USPTO file history for the Patents-In-Suit. In addition to those prior art documents and products already produced in this case by ViewSonic, documents that support this contention include, documents produced by TATUNG USA and TATUNG in response to Plaintiff's Second Set of Requests for Production of Documents, Plaintiff's Motion for Preliminary Injunction, ViewSonic's Opposition to Plaintiff's Motion for Preliminary Injunction, Plaintiff's Reply, ViewSonic's Request to File Sur-Reply, the First and Fourth Declarations of

William Bohannon, the Declaration and Supplemental Declaration of Mark Brinkerhoff, the Declaration of Mike Zapka, the Declaration of Alexandra Brodie, the Declaration of Tracy Roman, the deposition transcript of William Bohannon, the deposition transcript of Mark Brinkerhoff, the witness statements of Nicholas Talesfore, the witness statements of Mark Brinkerhoff, the witness statement of Stuart Morgan, the transcripts and exhibits from the trial held in the UK Patents County Court Case No. PAT04022 on September 15, 16, 19-22, 2005, draft amended Particulars of Infringement in the UK Patents County Court Case No. PAT04022; Amended Particulars of Infringement March 22, 2005 in the UK Patents County Court Case No. PAT04022; Re-Amended Particulars of Infringement August 11 2005 in the UK Patents County Court Case No. PAT04022; and the Judgment rendered on November 28, 2005 in the UK Patents County Court Case No. PAT04022. Tatung responds on information and belief that the records of, and pertaining to, the prosecution and subsequent appeal of the sibling Japanese patent application No. JP 2000132279.

People: At least the following:

Jong Hwan Kim; Young Woo Cho; Nicholas Talesfore; William Bohannon; Song K. Jung;
Rebecca Goldman Rudish; Matthew Bailey; John M Kelly; Eric Nuss; Kenneth D. Springer
Mark Brinkerhoff, Stuart Morgan.

Discovery is ongoing and TATUNG USA reserves the right to supplement this response.

Interrogatory No. 9.

For each claim of the Patents-In-Suit that you contend would have been obvious in response to the preceding interrogatory, identify each portion of each prior art item that provides an incentive, suggestion, and/or motivation to combine or modify the prior art to achieve the claimed invention, citing the document, page, column, line and/or figure reference numbers, as well as any testimony or statements supporting your contention.

Response:

TATUNG USA specifically objects to this Interrogatory on the grounds that it prematurely seeks expert discovery. TATUNG USA further objects to this Interrogatory on the grounds that it is overbroad and unduly burdensome. TATUNG USA also objects to this Interrogatory to the extent it seeks information that is protected by the attorney-client privilege and/or the work product doctrine, or that is otherwise privileged and protected from disclosure. Finally, TATUNG USA objects on the grounds that this Interrogatory seeks information which is not relevant to the claims or defenses of this lawsuit, and which is not reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiver of the general and specific objections, TATUNG USA refers Plaintiff to the Response to Interrogatory No. 8.

Interrogatory No. 10.

Identify each prior art reference or item that you contend is relevant, including prior use and product(s).

Response:

TATUNG USA specifically objects to this Interrogatory on the grounds that it prematurely seeks expert discovery. TATUNG USA further objects to this Interrogatory to the extent it seeks information that is protected by the attorney-client privilege and/or the work product doctrine, or that is otherwise privileged and protected from disclosure.

Subject to and without waiver of the general and specific objections, TATUNG USA states that the prior art includes at least the following:

Products

(a) Pixelvision SGT15P

- (b) IBM 9052
- (c) IBM 9516
- (d) Tatung L4KAS
- (e) Hewlett-Packard S1010 and/or S1010a
- (f) ViewSonic VP140
- (g) ViewSonic VPA138
- (h) Sharp TFT-LCD module Model No. LQ4RA35
- (i) Sharp TFT-LCD module Model No. LQ4RA32
- (j) Sharp Backlight Unit Model No. Model No. LQ0B03
- (k) The Primary Display Units for the Boeing 777 aircraft including Honeywell Part No. 4073610 (31-61-04) and (31-31-26)

Patents/Publications

- (l) "Cockpit Displays III," Darryl G. Hopper, April 10-11, 1996, SPIE - The International Society for Optical Engineering;
- (m) F-16 retrofit application using a modular avionics system architecture and color active matrix liquid crystal displays" ;
- (n) Randall E. Orkis, May 1994, Vol. 2219 Cockpit Displays SPIE - The International Society for Optical Engineering;
- (o) "An improved Full Color F16A/B and F16C/D Multi-Function Display Using A Ruggedized COTS Active Matrix Color Liquid Display Crystal Display";
- (p) U.S. Pat. No. 5,041,965 – issued August 20, 1991;
- (q) U.S. Pat. No. 5,119,204 – issued June 2, 1992;
- (r) U.S. Pat. No. 5,570,267 – issued October 29, 1996;
- (s) U.S. Pat. No. 5,831,816 – filed June 12, 1997;

- (t) U.S. Pat. No. 6,068,227 filed March 11, 1997;
- (u) JP 09-190156 – published July 1997;
- (v) JP 09-171358 – published July 1997;
- (w) JP Publication number 05-188810;
- (x) Sharp Liquid Crystal Display Group Sharp Corporation SPECIFICATION TFT-LCD module MODEL No. 4LQRA35 - July 1993;
- (y) (Sharp Liquid Crystal Display Group Sharp Corporation SPECIFICATION TFT-LCD module MODEL No. 4LQRA31 4LQRA32 - May 1991;
- (z) Sharp Liquid Crystal Display Group Sharp Corporation SPECIFICATION BACKLIGHT UNIT MODEL No. LQ0B01 - published July 31 1992.

See also the references identified by co-defendants ViewSonic. Discovery is continuing and TATUNG USA reserves the right to supplement this response.

Interrogatory No. 11.

For each prior art reference or item on which you rely, describe in detail how the alleged prior art reference or item qualifies as prior art under every section of Title 35 of the United States Code on which you rely, including, for example: the first date, by whom, and how the alleged prior art was known or used in the U.S., patented or described in a printed publication in any country, and/or conceived and reduced to practice; the making, knowledge, use, or sale of the prior art; the authors and title of each patent, patent application, and article/publication; the date that each reference was issued, filed, or published; the number of each patent and patent application; and/or the country(ies) where each reference was issued, filed, or published.

Response:

TATUNG USA specifically objects to this Interrogatory on the grounds that it prematurely seeks expert discovery. TATUNG USA further objects to this Interrogatory to the extent it seeks information that is protected by the attorney-client privilege and/or the work product doctrine, or that is otherwise privileged and protected from disclosure.

Subject to and without waiver of the general and specific objections, TATUNG USA states that the prior art includes at least the following:

"F-16 retrofit application using a modular avionics system architecture and color active matrix liquid crystal displays" Published May 1994;

"An improved Full Color F16A/B and F16C/D Multi-Function Display Using A Ruggedized COTS Active Matrix Color Liquid Display Crystal Display" Published March 1995;

"Cockpit Displays III," Darryl G. Hopper, April 10-11, 1996, SPIE - The International Society for Optical Engineering;

U.S. Pat. No. 5,041,965 (Chen) – issued August 20, 1991;

U.S. Pat. No. 5,119,204 (Hashimoto) – issued June 2, 1992;

U.S. Pat. No. 5,570,267 – (Ma) issued October 29, 1996;

U.S. Pat. No. 5,831,816 – (Johns) filed June 12, 1997;

U.S. Pat. No. 6,068,227 (Morgan) filed March 11, 1997;

JP 09-190156 – (Fujitsu) published July 1997;

JP 09-171358 – (Fujitsu) published July 1997;

JP 05-188810 (Sumitomo Wiring System Ltd.) published January 1995;

Sharp Liquid Crystal Display Group Sharp Corporation SPECIFICATION TFT-LCD module MODEL No. 4LQRA35 - published July 1993;

Sharp Liquid Crystal Display Group Sharp Corporation SPECIFICATION TFT-LCD module MODEL No. 4LQRA31 4LQRA32 - published May 1991;

Sharp Liquid Crystal Display Group Sharp Corporation SPECIFICATION BACKLIGHT UNIT MODEL No. LQ0B01 - published July 31 1992;

On information and belief, TATUNG USA responds that co-defendant ViewSonic's

VP140 product line was first manufactured and made available for sale in the United States in the first quarter of 1997 and was selling from March 1997 through October 1998. ViewSonic sold 13,696 units of the VP140 LCD monitor in the United States.

On information and belief, TATUNG USA responds that co-defendant ViewSonic's VPA138 product line was first manufactured and made available for sale in the United States in the fourth quarter of 1997. From November 1997 through October 1998, ViewSonic sold 3,183 units of the VP140 LCD monitor in the United States.

The IBM 9052 Monitor bears identification references 39H7116 JSR NC401 C-1030 1-3 and has a date stamp indicating 1/96 imprinted onto the interior metal tray. According to the IBM website, the IBM 9516 monitors were announced on March 16, 1998 and had an expected product availability date of March 17, 1998. In addition, an article dated April 1998 reviewing the IBM 9516 monitor was published online at www.techweb.com. As to the particular monitor referenced in Mr. Brinkerhoff's Supplemental Declaration, it bears Serial No. 97-01887 and indicates it was manufactured by IBM Japan Ltd in 1997. TATUNG USA is informed and believes that that particular IBM 9516 monitor has been in use since before October 1998.

The TATUNG Monitor LK4AS product line was first manufactured and made available for sale in the United States in the third quarter of 1998.

TATUNG USA is informed and believes that that Sharp TFT-LCD module MODEL No. LQ4RA35 was available on or before July 1993.

TATUNG USA is informed and believes that that Sharp TFT-LCD module MODEL No. LQ4RA31 was available on or before May 1991.

TATUNG USA is informed and believes that that Sharp TFT-LCD module MODEL No. LQ4RA32 was available on or before May 1991.

TATUNG USA is informed and believes that that Sharp TFT-LCD backlight LQ0B03

was available on or before July 1993.

TATUNG USA is informed and believes that that Sharp TFT-LCD backlight LQ0B01 was available on or before July 1992.

TATUNG USA is informed and believes that the PixelVision SGT15P was made publicly available in 1997. His Honour Judge Fysh QC has adjudged that the PixelVision monitor was publicly available before October 23, 1999. As to the particular monitor referenced in Mr. Brinkerhoff's Supplemental Declaration, its housing bears serial number PVN97 42074, its printed circuit board bears serial number 9742074 and a copyright date of 1997, and its rear housing is imprinted with a date stamp of 8/97.

See also the Answer of co-defendant Viewsonic to the Complaint. Discovery is continuing and TATUNG USA reserves the right to supplement this response.

Interrogatory No. 12.

If you contend that you previously conceived, reduced to practice, or otherwise invented the subject matter recited in the Patents-In-Suit, set forth in detail the entire basis for your contention, including stating all relevant facts, identifying all documents on which you rely for this contention, and identifying all persons with information or knowledge relevant to this defense, summarizing each person's knowledge.

Response:

TATUNG USA specifically objects to this Interrogatory to the extent it seeks information that is protected by the attorney-client privilege and/or the work product doctrine, or that is otherwise privileged and protected from disclosure. TATUNG USA further objects to this Interrogatory as vague and ambiguous as the term "previously" has no reference to any point in time, thus making the Interrogatory unintelligible. In view of these objections, no further response is possible until further clarification is provided as to what the term "previously" means in the context of Interrogatory No. 12.

Interrogatory No. 13.

Regarding your ninth affirmative defense (laches), set forth in detail the entire basis for your defense, including stating all relevant facts, identifying all documents on which you rely for this defense, and identifying all persons with information or knowledge relevant to this defense, summarizing each person's knowledge.

Response:

TATUNG USA specifically objects to this Interrogatory to the extent it seeks information that is protected by the attorney-client privilege and/or the work product doctrine, or that is otherwise privileged and protected from disclosure.

Subject to and without waiver of the general and specific objections, TATUNG USA states that L17AMTN has been offered for sale at least as early as January 17, 2003. By way of further response, TATUNG USA responds by stating that the additional information necessary to respond to this Interrogatory is in Plaintiff's possession. TATUNG USA anticipates discovering this information as the case continues and, therefore, reserves the right to supplement this response.

Interrogatory No. 14.

Regarding your tenth affirmative defense (estoppel), set forth in detail the entire basis for your defense, including stating all relevant facts, identifying all documents on which you rely for this defense, and identifying all persons with information or knowledge relevant to this defense, summarizing each person's knowledge.

Response:

TATUNG USA specifically objects to this Interrogatory to the extent it seeks information that is protected by the attorney-client privilege and/or the work product doctrine, or that is otherwise privileged and protected from disclosure.

Subject to and without waiver of the general and specific objections, TATUNG USA responds by stating that the burden of deriving or ascertaining the answer to this Interrogatory is

substantially the same for both Plaintiff and TATUNG USA and, pursuant to Fed. R. Civ. P. Rule 33(d), will provide the following records from which the answer may be derived or ascertained: the prosecution histories of the Patents-In-Suits. Discovery is continuing and TATUNG USA reserves the right to supplement this response.

Interrogatory No. 15.

Regarding your eleventh affirmative defense (unclean hands), set forth in detail the entire basis for your defense, including stating all relevant facts, identifying all documents on which you rely for this defense, and identifying all persons with information or knowledge relevant to this defense, summarizing each person's knowledge.

Response:

TATUNG USA specifically objects to this Interrogatory to the extent it seeks information that is protected by the attorney-client privilege and/or the work product doctrine, or that is otherwise privileged and protected from disclosure.

Subject to and without waiver of the general and specific objections, TATUNG USA states that the burden of deriving or ascertaining the answer to this Interrogatory is substantially the same for both Plaintiff and TATUNG USA and, pursuant to Fed. R. Civ. P. Rule 33(d), will provide the following records from which the answer may be derived or ascertained: TDE 000001-000090. TATUNG USA further states that the additional information necessary to respond to this Interrogatory is in Plaintiff's possession, which TATUNG USA expects to discover as the case continues. TATUNG USA has conducted a reasonable inquiry and diligent search, but has not yet located additional information responsive to this Interrogatory. Discovery is continuing and TATUNG USA reserves the right to supplement this response.

Interrogatory No. 16.

Regarding your twelfth affirmative defense (marking), set forth in detail the entire basis for your defense, including stating all relevant facts, identifying all documents on which

you rely for this defense, and identifying all persons with information or knowledge relevant to this defense, summarizing each person's knowledge.

Response:

TATUNG USA specifically objects to this Interrogatory on the grounds that it prematurely seeks expert discovery. TATUNG USA further objects to this Interrogatory to the extent it seeks information that is protected by the attorney-client privilege and/or the work product doctrine, or that is otherwise privileged and protected from disclosure.

Subject to and without waiver of the general and specific objections, TATUNG USA states that, on information and belief, it believes that Plaintiff has sold products which practice the Patents-In-Suit but which have not been marked in accordance with 35 U.S.C. §287. Additional information necessary to respond further to this Interrogatory is in Plaintiff's possession, which TATUNG USA expects to discover as the case continues. TATUNG USA has conducted a reasonable inquiry and diligent search, but has not yet located additional information responsive to this Interrogatory. Discovery is continuing and TATUNG USA reserves the right to supplement this response.

Interrogatory No. 17.

Regarding your thirteenth affirmative defense (patent misuse), set forth in detail the entire basis for your defense, including stating all relevant facts, identifying all documents on which you rely for this defense, and identifying all persons with information or knowledge relevant to this defense, summarizing each person's knowledge.

Response:

TATUNG USA specifically objects to this Interrogatory on the grounds that it prematurely seeks expert discovery. TATUNG USA further objects to this Interrogatory to the extent it seeks information that is protected by the attorney-client privilege and/or the work product doctrine, or that is otherwise privileged and protected from disclosure.

Subject to and without waiver of the general and specific objections, TATUNG USA states that LG has previously sued Tatung (UK) Ltd. before the UK Patents County Court Case No. PAT04022 for infringement of a UK counterpart patent (GB2346464) to the patents in-suit for LG's so-called "rear mount" technology. Initially, LG claimed infringement against the L17AMTN monitor and provided the court with a primary case on construction and infringement by such monitor. Eventually, after receiving various disclosures of prior art, LG amended its "Particulars of Infringement", sought to amend the claims, and withdrew its claim of infringement against the L17AMTN monitor.

By the time the case came to trial in the UK, LG no longer claimed that the L17AMTN monitor infringed its patent, whether as granted or as sought to be amended. The UK court found the UK patent to be invalid and so revoked it pending any appeal by LG. The UK court also refused LG's application to amend the patent and dismissed all of its remaining assertions of infringement against other Tatung monitors. TATUNG USA further states that pursuant to Fed. R. Civ. P. Rule 33(d), TATUNG USA will rely the following records from which the answer may be derived or ascertained: TDE 000169-000183.

By way of further response, TATUNG USA refers Plaintiff to the prior art that TATUNG USA's parent company TATUNG CO. is producing in this case and to TATUNG USA's responses to Interrogatory Nos. 10 and 11. TATUNG USA also states that additional information necessary to respond to this Interrogatory is in Plaintiff's possession. Discovery is continuing and TATUNG USA reserves the right to supplement this response.

Interrogatory No. 18.

Regarding your fourteenth affirmative defense (inequitable conduct), set forth in detail the entire basis for your defense (specifically including, but not limited to, the basis for your allegation that "The failure to disclose this information was knowing, willful, and done with an intent to deceive the PTO into issuing the patents-in-suit"), including stating

all relevant facts, identifying all documents on which you rely for this defense, and identifying all persons with information or knowledge relevant to this defense, summarizing each person's knowledge.

Response:

TATUNG USA specifically objects to this Interrogatory to the extent it seeks information that is protected by the attorney-client privilege and/or the work product doctrine, or that is otherwise privileged and protected from disclosure. Subject to and without waiver of the general and specific objections, TATUNG USA responds by stating that, at present, its inequitable conduct defense is based on conduct and information including, but not limited to, the following: misrepresentations of or failures to disclose material information such as limitations of the foreign patent relied upon; failure to disclose prior art believed to be known to plaintiff, its employees and agents, due to the wide availability of various LCD monitors and devices sold, offered for sale, marketed and/or manufactured by others, including products sold by Pixelvision, such as the SGT 115; CTX, such as the Panoview 600; IBM, such as the 9052; Apple, such as the duo product line and flat panel display for the Apple II; Tatung, such as L4KAS; Hewlett-Packard, such as the s1010a; Sun, such as the Voyager; Compaq, such as the 640; Viewsonic, such as the 140; Advantech, such as the PPC-140T and, on information and belief, Sumitomo and LG Semicon; and failure to disclose publications and patents including "Cockpit Displays;" U.S. Pat. Nos. 5,041,965; 5,119,204; 5,570,267; 5,831,816; 5,844,772; and Japanese Patent Nos. 407020447A, 4091711358A, 4019190156A, 406214511A, and 410117313A. TATUNG USA further states that the persons with knowledge pertaining to TATUNG USA's defense are as follows; Song K. Jung, Rebecca Goldman Rudish; Matthew Bailey; John M Kelly; Eric Nuss; Kenneth D. Springer.

By way of further response, TATUNG USA states that the additional information necessary to respond to this Interrogatory is in Plaintiff's possession. Discovery is continuing and TATUNG USA reserves the right to supplement this response.

As to Objections,

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Dated: February 13, 2006

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America Inc

As to the Answers to the Second Set of Interrogatories:

I declare under penalty of perjury that the foregoing is true and correct.

Date: _____

Tatung Company of America, Inc.

Name

EXHIBIT B

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

LG Philips LCD Co.,)	
Plaintiff,)	
v.)	C.A. No.: 04-343-JJF
Tatung Co., Tatung Company of America Inc.,)	
and Viewsonic Corp)	JURY TRIAL DEMANDED
)	
Defendants.)	

**DEFENDANT TATUNG COMPANY'S FIRST SUPPLEMENTAL RESPONSES TO
PLAINTIFF'S SECOND SET OF INTERROGATORIES NOS. 2 AND 3**

Defendant Tatung Company ("TATUNG") hereby makes its Objections and Responses to the Plaintiff's Second Set of Interrogatories as follows:

PRELIMINARY STATEMENT

TATUNG has not yet completed its gathering of facts and documents related to this action. Therefore, in responding to the Interrogatories, TATUNG reserves the right to revise, correct, add to, supplement, and clarify any of its responses.

All responses are submitted as presently advised, and without prejudice to TATUNG's right to modify, amend, revise, correct, supplement, add to or clarify such responses at the appropriate time.

Counsel for TATUNG invites discussion with counsel for Plaintiff with respect to these responses, with the expectation that discussions between counsel may eliminate or modify objections, reduce burdens on TATUNG, or otherwise result in a mutually satisfactory resolution of the objections set forth herein

GENERAL OBJECTIONS

TATUNG hereby makes the following general objections to all of the individual Interrogatories. These general objections are incorporated into each and every Interrogatory set forth below, whether referenced specifically or not.

1 TATUNG hereby interposes the following general objections to all of the individual Interrogatories contained in Plaintiff's Interrogatories. These general objections are incorporated into each and every individual objection set forth below, whether referenced specifically or not.

2. TATUNG specifically objects to Plaintiff's Second Set of Interrogatories on the grounds that such Interrogatories are overly broad and unduly burdensome, and/or because it Interrogatories documents that are neither relevant to the subject matter of this proceeding nor reasonably calculated to lead to the discovery of admissible evidence.

3. TATUNG objects to the Interrogatories to the extent they seek information or documents that are protected from disclosure by the attorney-client privilege or other privilege, or by the work-product doctrine. Such information or documents will not be produced to Plaintiffs and any inadvertent production shall not be deemed a waiver of any privilege with respect to the information or any work product doctrine which may apply.

4. TATUNG objects to the Interrogatories to the extent they attempt to impose duties that are beyond the scope of the Federal Rules of Civil Procedure and the Local Rules of this Court.

5 TATUNG objects to the Interrogatories on the grounds that they are not limited by time, and, therefore, are in many instances overly broad and unduly burdensome, and/or

Interrogatory documents that are neither relevant to the claims and defenses of this proceeding nor reasonably calculated to lead to the discovery of admissible evidence.

6 TATUNG objects to the Interrogatories as to the requested time, place, and manner. It is not currently possible to accurately gauge the quantity of documents requested. To the extent that there are properly producible documents, they will be produced at a mutually agreed upon time, place, and manner.

7 TATUNG objects to the Interrogatories to the extent that they seek materials obtained or prepared in anticipation of litigation or trial, materials prepared by or for an attorney, materials protected by a state or federal right of privacy or protection, materials protected from disclosure under relevant procedural rules or case law, and further seek mental impressions, conclusions, opinion, or legal theories concerning anticipated or actual litigation.

8 TATUNG objects to the Interrogatories on the grounds that they seek information that is more readily and efficiently obtained through deposition questions rather than written discovery.

9. TATUNG objects to the Interrogatories on the grounds that they seek information that is readily accessible to Plaintiffs from public sources or Plaintiff's own files.

10. TATUNG objects to the Interrogatories on the grounds and to the extent that they call for disclosure of proprietary or confidential information or trade secrets, disclosure of which would be prejudicial to TATUNG, its customers, suppliers, and any witnesses testifying on behalf of TATUNG, the clients of such witness, or the person or persons who provided such information to TATUNG. Any such information that TATUNG provides will be provided subject to the stipulated Protective Order entered into by the parties in this proceeding.

11. TATUNG objects to the Interrogatories to the extent that they seek information that, if furnished, would violate a court order, protective order, and/or stipulation of confidentiality that has been entered with respect to such information.

12. TATUNG objects to the Interrogatories to the extent that they call for disclosure of proprietary or confidential information of a third party, or the joint proprietary or confidential information of TATUNG and the third party. TATUNG will not provide such information until the third party has been notified of such Requests, and the third party has consented to the production of such requested information.

13. TATUNG objects to the Interrogatories to the extent that they seek copyrighted material or other information, the copyright, or other intellectual property rights, access to which TATUNG does not possess.

14. TATUNG objects to the Interrogatories as premature to the extent that they seek disclosure of witnesses, evidence and theories to be presented by TATUNG at the trial of this action before TATUNG has had an opportunity to obtain discovery.

15. TATUNG objects to the Interrogatories on the grounds and to the extent that responding to such Interrogatories would improperly require TATUNG or its witnesses, or both, to perform studies, analyses, calculations or compilations that do not currently exist.

SPECIFIC RESPONSES AND OBJECTIONS TO INTERROGATORIES 2 AND 3

Subject to the general objections, TATUNG makes the following specific objections and responses:

Interrogatory No. 2.

Identify each type of visual display product (such as the Tatung L17AMTN monitor) manufactured, shipped, imported, sold, and/or offered for sale, by or for you, since January 1, 2002, and specify which products have been marketed or sold under a trademark or brand name that belongs to TATUNG or its affiliated entities.

Response:

Subject to and without waiver of the previously stated and present general and specific objections and in addition to our previous response, TATUNG states that, based upon information and belief, the following Tatung LCD computer monitors have been shipped, imported, sold, or offered for since January 1, 2002:

L15ACAP
 L15BCVK
 L15CCAE
 L15CCAE-U07
 L15CCAE-U27
 L15CCAT
 L15CCAT UA3/UB3
 L15CCAT-U01
 L15CCAT-U05
 L15CCAT-U13
 L15CCAT-U23
 L15CCAT-U32
 L15CCAT-UA3
 L15CCAT-UB3
 L15CCAT U01 U32
 L15CCQT
 L15CCQT-U09
 L15CCQT-U19
 L15ECAE-U27
 L15ECAE-U37
 L15FCBT
 L15FCBT-U02
 L15FCBT-U09
 L15FCBT-U12
 L15HCAP-E34
 L17ACAE-U07
 L17ACAH
 L17ACLN-U03
 L17ACLN-U13
 L17ACLN-UB3
 L17ACTN-U01
 L17ACTN-U23
 L17ACTN-U32
 L17ACTN-UC3
 L17ACTN-UD2
 L17AMTN-U01
 L17AMTN-U03
 L17AMTN-U22
 L17AMTN-U23
 L17AMTN-U32
 L17CCAT-U05
 L1CCAT
 L17CCAT E01
 L17CMAT-E05

L17CM(Q)AT-E05
L17CQAT-U05
L17DSAV-U16
L17DMAV=DSAV
L17ECAE
L17ECAE-U07
L17ECBQ-U08
L17FCBT
L17FCBT-U02
L17FCBT-U12
L17FCBT=FCMT
L17FCMT-U05
L17KCBQ-U08
L17NCDT
L17NCDT-U00
L17PCAG
L17PCBG-U05
L17PCBG-U15
L17PCBG-UA5
L19ACLN
L19ACLN-U13
L19ACTN-U23
L19AMTN
L19AMTN-U01
L19CM(Y)AT-E05
L19CM(Y)AT
L19CMAT
L19CMAT-U32
L19CYAT-U05
L19FCBT
L19FCBT-U12
L19FCMT
L19NCDT-U00
L19NCDT-U00/E01
L5cds
L5CDS/T
L5PDS/T
L5TDS/T
L5CSDP-J25
L5CSDP-C81
L5CSDP-E11
L5CSDP-U92
L5CSDP-U91
L5CSDP-J21
L5CSDP-J22
L5CSDP-D11
L5CSDP-J31
L5CSDP-J32
L5CSDP-D12
L5CSDP-S03
L5CSDP-U81
L5CSDP-U11
L5CSDP-U82
L5CSDP-J15
L5CSDP-U72
L5CSDP-D02
L5CSDP-J05

L5CDSDP-E01
L5CDSDP-E81
L5CDSDP-D01
L5CDSDP-U01
L5CDSDP-U21
L5CDSDP-U22
L5CDSDP-U26
L5CDSDP-U31
L5CDSDP-U32
L5HCAP
L5CESDP-U81
L5CESPP-U01
L5CESPP-U12
L5CESPP-U32
L5CESPP-U41
L5CESPP-U42
L5CESPP-U62
L5CTSDP-U01
L5CTSDP-U03
L5CTSDP-U06
L5CTSDP-U13
L5CTSDP-U52
L5CTSDP-U62
L5CTSDP-UA3
L5PEBPP-U01
L5PHSDP-U19
L5PHSDP-U29
L5PVTTP
L5PVTTP-J15
L5PVTTP-U25
L5SVTPP-U45
PTAB915DN01
PTAB915DN02
PTAB915DN03
PTAB915DN04
PTAB915DN07
PTAB915DN09
PTAB915DN10
PTAB915DN11
PTAB915DN12
RTABB10-S01
TTAB510-N03
TTAB910
TTAB910EA01
TTAB910EG01
TTAB910EN01
TTAB910EN02
TTAB910-N01
TTAB910-N04
TTAB915DN01
TTABA12DB04
TTABA12DF02
TTABA12DN04
TTABA12DN06
TTABB10-N01
TTABB10-N02
TTABB12DB15

TTAB812DCN1
TTAB812DDN6
TTAB812DH05
TTAB812DJ06
TTAB812DN01
TTAB812DN02
TTAB812DN03
TTAB812DN04
TTAB812DN07
TTAB812DN10
TTAB812DN12
TTAB812DN14
TTAB812DN15
TTAB812DN16
TTAB812DN18
TWN-5213K03
TWN-5213K20
V15PCAP-U03
V17AFTW-U01
V17AFTW-U01
V17AFTW-E07
V17ULAJ-U06
V23CLTT-U01
V23CLTT
V23CLTT-U02
V23CLTT-U05
V23CLTT-HG1
V23ULAJ-U06
V26ALAH-U15
V27CMTT-U01
V30CMBT-J02
V30CMTT-U03
V30CMTT-U05
V37ALAH-U15
V32ALAH-U15
V32FLBB
V32FLBB-U21
VTAB830
VTAB830-E01
VTAB830-E02
VTAB830-N01
VTAB830-POS

Interrogatory No. 3.

Identify each type of visual display product (such as the Tatung L17AMTN monitor) manufactured, shipped, imported, sold, and/or offered for sale, in or to the United States, by or for you, since January 1, 2002.

Response:

Subject to and without waiver of the previously stated and present general and specific objections and in addition to our previous response, TATUNG states that, based upon information and belief, the following Tatung LCD computer monitors have been manufactured, shipped, imported, sold, and/or offered for sale, in or to the United States since January 1, 2002.

L15ACAP
 L15BCVK
 L15CCAE
 L15CCAE-U07
 L15CCAE-U27
 L15CCAT
 L15CCAT UA3/UB3
 L15CCAT-U01
 L15CCAT-U05
 L15CCAT-U13
 L15CCAT-U23
 L15CCAT-U32
 L15CCAT-UA3
 L15CCAT-UB3
 L15CCAT U01 U32
 L15CCQT
 L15CCQT-U09
 L15CCQT-U19
 L15ECAE-U27
 L15ECAE-U37
 L15FCBT
 L15FCBT-U02
 L15FCBT-U09
 L15FCBT-U12
 L17ACAE-U07
 L17ACAH
 L17ACLN-U03
 L17ACLN-U13
 L17ACLN-UB3
 L17ACTN-U01
 L17ACTN-U23
 L17ACTN-U32
 L17ACTN-UC3
 L17ACTN-UD2
 L17AMTN-U01
 L17AMTN-U03
 L17AMTN-U22
 L17AMTN-U23
 L17AMTN-U32
 L17CCAT-U05
 L1CCAT
 L17CQAT-U05
 L17DSAV-U16
 L17DMAV-DSAV
 L17ECAE

L17ECAE-U07
L17ECBQ-U08
L17FCBT
L17FCBT-U02
L17FCBT-U12
L17FCBT-FCMT
L17FCMT-U05
L17KCBQ-U08
L17NCDT
L17NCDT-U00
L17PCAG
L17PCBG-U05
L17PCBG-U15
L17PCBG-UA5
L19ACLN
L19ACLN-U13
L19ACTN-U23
L19AMTN
L19AMTN-U01
L19CM(Y)AT
L19CMAT
L19CMAT-U32
L19CYAT-U05
L19FCBT
L19FCBT-U12
L19FCMT
L19NCDT-U00
L5cds
L5CDS/T
L5PDS/T
L5TDS/T
L5CDSDP-U92
L5CDSDP-U91
L5CDSDP-U81
L5CDSDP-U11
L5CDSDP-U82
L5CDSDP-U72
L5CDSDP-U01
L5CDSDP-U21
L5CDSDP-U22
L5CDSDP-U26
L5CDSDP-U31
L5CDSDP-U32
L5HCAP
L5CESDP-U81
L5CESPP-U01
L5CESPP-U12
L5CESPP-U32
L5CESPP-U41
L5CESPP-U42
L5CESPP-U62
L5CTSDP-U01
L5CTSDP-U03
L5CTSDP-U06
L5CTSDP-U13
L5CTSDP-U52
L5CTSDP-U62

L5CTSDP-UA3
L5PESPP-U01
L5PHSDP-U19
L5PHSDP-U29
L5PVTTP
L5PVTTP-U25
L5SVTTP-U45
PTAB915DN01
PTAB915DN02
PTAB915DN03
PTAB915DN04
PTAB915DN07
PTAB915DN09
PTAB915DN10
PTAB915DN11
PTAB915DN12
TTAB910EN01
TTAB910EN02
TTAB910-N01
TTAB910-N04
TTAB915DN01
TTABAI2DB04
TTABAI2DN04
TTABAI2DN06
TTABB10-N01
TTABB10-N02
TTABB12DB15
TTABB12DN01
TTABB12DN02
TTABB12DN03
TTABB12DN04
TTABB12DN07
TTABB12DN10
TTABB12DN12
TTABB12DN14
TTABB12DN15
TTABB12DN16
TTABB12DN18
TWN-5213K03
TWN-5213K20
V15PCAP-U03
V17AFTW-U01
V17AFTW-U01
V17U1AJ-U06
V23CLTT-U01
V23CLTT
V23CLTT-U02
V23CLTT-U05
V23CLTT-HG1
V23U1AJ-U06
V26ALAH-U15
V27CMTT-U01
V30CMTT-U03
V30CMTT-U05
V37ALAH-U15
V32ALAH-U15
V32FLBB

V32FLBB-U21
VTA8830

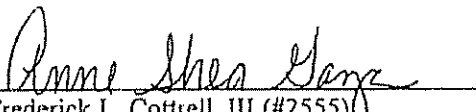
By way of further response, TATUNG states that additional information necessary to respond to this Interrogatory is in Plaintiff's possession. TATUNG reserves the right to further supplement this response.

As to Objections,

Of Counsel:
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Mark H. Krietzman
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Dated: October 20, 2006


Frederick L. Cottrell, III (#2555)
Anne Shea Gaza (#4093)
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Wilmington, Delaware 19899
(302) 651-7700
cottrell@rlf.com
gaza@rlf.com
Attorneys for Defendant Tatung Company

As to the Answers to the Second Set of Interrogatories:

I declare under penalty of perjury that the foregoing is true and correct.

Date: _____

Tatung Company

Name

UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE

CERTIFICATE OF SERVICE

I hereby certify that on October 20, 2006, I caused to be served by hand delivery the foregoing document to the following:

Richard D. Kirk, Esquire
The Bayard Firm
222 Delaware Avenue #900
Wilmington, DE 19899

Jeffrey B. Bove, Esquire
Jaclyn M. Mason, Esquire
Connolly Bove Lodge & Hutz LLP
1007 North Orange Street
P.O. Box 2207
Wilmington, DE 19899

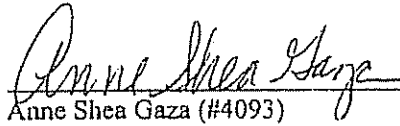
Richard L. Horwitz, Esquire
David E. Moore, Esquire
Potter Anderson & Corroon LLP
1313 N. Market Street
Hercules Plaza, 6th Floor
Wilmington, DE 19899

I hereby certify that on October 20, 2006, I have sent by Federal Express the foregoing document to the following:

Daniel G. Jarcho, Esquire
Cass W. Christenson, Esquire
Lora A. Brzezynski, Esquire
Matthew T. Bailey, Esquire
McKenna Long & Aldridge LLP
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355 South Grand Avenue
Suite 3150
Los Angeles, CA 90071

A handwritten signature in cursive script, reading "Anne Shea Gaza", written over a horizontal line.

Anne Shea Gaza (#4093)

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EXHIBIT C

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

LG Philips LCD Co ,)	
Plaintiff,)	
v.)	C.A. No : 04-343-JJF
Tatung Co., Tatung Company of America Inc ,)	
and Viewsonic Corp.)	JURY TRIAL DEMANDED
)	
Defendants.)	

**DEFENDANT TATUNG COMPANY OF AMERICA, INC.'S FIRST SUPPLEMENTAL
RESPONSES TO PLAINTIFF'S SECOND SET OF INTERROGATORIES NOS. 2 AND 3**

Defendant Tatung Company of America Inc. ("TATUNG USA"), by and through its attorneys Greenberg Traurig, LLP, hereby makes its Objections and Responses to the Plaintiff's Second Set of Interrogatories ("Interrogatories") as follows:

PRELIMINARY STATEMENT

TATUNG USA has not yet completed its gathering of facts and documents related to this action. Therefore, in supplementing its responses to the Interrogatories, TATUNG USA reserves the right to revise, correct, add to, supplement, and clarify any of its responses.

All responses are submitted as presently advised, and without prejudice to TATUNG USA's right to modify, amend, revise, correct, supplement, add to or clarify such responses at the appropriate time.

Counsel for TATUNG USA invites discussion with counsel for Plaintiff with respect to these responses, with the expectation that discussions between counsel may eliminate or modify objections, reduce burdens on TATUNG USA, or otherwise result in a mutually satisfactory resolution of the objections set forth herein

GENERAL OBJECTIONS

TATUNG USA hereby makes the following general objections to all of the individual Interrogatories. These general objections are incorporated into each and every Interrogatory set forth below, whether referenced specifically or not

1. TATUNG USA hereby interposes the following general objections to all of the individual Interrogatories contained in Plaintiff's Interrogatories. These general objections are incorporated into each and every individual objection set forth below, whether referenced specifically or not.

2. TATUNG USA specifically objects to Plaintiff's Second Set of Interrogatories on the grounds that such Interrogatories are overly broad and unduly burdensome, and/or because it Interrogatories documents that are neither relevant to the subject matter of this proceeding nor reasonably calculated to lead to the discovery of admissible evidence

3. TATUNG USA objects to the Interrogatories to the extent they seek information or documents that are protected from disclosure by the attorney-client privilege or other privilege, or by the work-product doctrine. Such information or documents will not be produced to Plaintiffs and any inadvertent production shall not be deemed a waiver of any privilege with respect to the information or any work product doctrine which may apply

4. TATUNG USA objects to the Interrogatories to the extent they attempt to impose duties that are beyond the scope of the Federal Rules of Civil Procedure and the Local Rules of this Court.

5. TATUNG USA objects to the Interrogatories on the grounds that they are not limited by time, and, therefore, are in many instances overly broad and unduly burdensome,

and/or Interrogatory documents that are neither relevant to the claims and defenses of this proceeding nor reasonably calculated to lead to the discovery of admissible evidence

6. TATUNG USA objects to the Interrogatories as to the requested time, place, and manner. It is not currently possible to accurately gauge the quantity of documents requested. To the extent that there are properly producible documents, they will be produced at a mutually agreed upon time, place, and manner

7. TATUNG USA objects to the Interrogatories to the extent that they seek materials obtained or prepared in anticipation of litigation or trial, materials prepared by or for an attorney, materials protected by a state or federal right of privacy or protection, materials protected from disclosure under relevant procedural rules or case law, and further seek mental impressions, conclusions, opinion, or legal theories concerning anticipated or actual litigation.

8. TATUNG USA objects to the Interrogatories on the grounds that they seek information that is more readily and efficiently obtained through deposition questions rather than written discovery.

9. TATUNG USA objects to the Interrogatories on the grounds that they seek information that is readily accessible to Plaintiffs from public sources or Plaintiff's own files.

10. TATUNG USA objects to the Interrogatories on the grounds and to the extent that they call for disclosure of proprietary or confidential information or trade secrets, disclosure of which would be prejudicial to TATUNG USA, its customers, suppliers, and any witnesses testifying on behalf of TATUNG USA, the clients of such witness, or the person or persons who provided such information to TATUNG USA. Any such information that TATUNG USA provides will be provided subject to the stipulated Protective Order entered into by the parties in this proceeding.

11. TATUNG USA objects to the Interrogatories to the extent that they seek information that, if furnished, would violate a court order, protective order, and/or stipulation of confidentiality that has been entered with respect to such information.

12. TATUNG USA objects to the Interrogatories to the extent that they call for disclosure of proprietary or confidential information of a third party, or the joint proprietary or confidential information of TATUNG USA and the third party. TATUNG USA will not provide such information until the third party has been notified of such Requests, and the third party has consented to the production of such requested information.

13. TATUNG USA objects to the Interrogatories to the extent that they seek copyrighted material or other information, the copyright, or other intellectual property rights, access to which TATUNG USA does not possess.

14. TATUNG USA objects to the Interrogatories as premature to the extent that they seek disclosure of witnesses, evidence and theories to be presented by TATUNG USA at the trial of this action before TATUNG USA has had an opportunity to obtain discovery.

TATUNG USA objects to the Interrogatories on the grounds and to the extent that responding to such Interrogatories would improperly require TATUNG USA or its witnesses, or both, to perform studies, analyses, calculations or compilations that do not currently exist.

SPECIFIC RESPONSES AND OBJECTIONS TO THE INTERROGATORIES

Subject to the general objections, TATUNG USA makes the following specific objections and supplemental responses to interrogatories 2 and 3:

Interrogatory No. 2.

Identify each type of visual display product (such as the Tatung L17AMTN monitor) manufactured, shipped, imported, sold, and/or offered for sale, by or for you, since January 1, 2002, and specify which products have been marketed or sold under a trademark or brand name that belongs to Tatung Co. or its affiliated entities.

First Supplemental Response:

Subject to and without waiver of the previously stated and present general and specific objections and in addition to our previous response, TATUNG USA states that, based upon information and belief, the following Tatung LCD computer monitors have been shipped, imported, sold, or offered for sale since January 1, 2002:

42 Inch lcd olm
 DELPHI
 ADMNLC27
 ADMNLC30
 ADMNPLASMA42
 ADMNPLASMA46
 ADMNPLASMA50
 DMAV-2701
 DMAV-3201
 DTV-29XRT
 HT12X21-210-INV
 L10PA35
 L10PA35A
 L10PA35A01
 L10PA35A21A
 L10PA35A51A
 L10PA35M21LA
 L10PC35A
 L12BA40A61AA
 L12BA40B
 L12RB25C21L-G
 L15CA110-DELPHI
 L15CA25
 L15CA25/15 CPT XP01
 L15CA25/COLOR FACTOR
 L15CA25A21AH1
 L15CA25E21AJ01
 L15CA25E-U01
 L15CA25H1
 L15CA25H101
 L15CA25H11
 L15CA25M21LH1
 L15CA25M21LK
 L15CA25M21L-K
 L15CA25M21LL
 L15CA25P21AH1
 L15CA25T21LH1

L15CA25T51LH1-1
 L15CA35M51LA
 L15CC25A
 L15CC25C
 L15CC25H
 L15CCATB DETEL
 L15CCAT-U01
 L15LA43M21LM
 L15LA43M51LM
 L15LA43T21LN
 L15MA25T21LA
 L15RA25-K01
 L15RA25M21LA
 L15RA25M21LX
 L15RA25T21LA
 L15SA25-DPI
 L17AA25M21LD
 L17AA25M21LD\ L17AA25A-
 SMI
 L17ACTNB-U32 AD
 L17ACTNB-UD2 AD
 L17ACTN-KM21L
 L17ACTN-U01
 L17AMNT-KE21A
 L17AMTN
 L17AMTNB-U32 AD
 L17AMTN-K
 L17AMTN-K01
 L17AMTN-KA21A
 L17AMTN-KE21AB
 L17AMTN-KE51A
 L17AMTN-KE51AB
 L17AMTN-KM21L
 L17AMTNK-M21L M01L
 L17AMTN-KM21L01
 L17AMTN-KM21L02
 L17AMTN-KM21L1
 L17AMTN-KM51L
 L17AMTN-SR
 L17CA25A
 L17CA25A01
 L17CA25B
 L17CA25E21AA
 L17CA25M01LB
 L17CA25M21LA
 L17CA25M21LA2
 L17CA25M21LB
 L17CA25M21LC
 L17CA25M21LD
 L17CA25M21LD01
 L17CA25M21LE
 L17CA25T21LD

L17CA25T51LA
L17CA30A
L17CA30A01
L17CA30A21AA
L17CA30M01LB
L17CA30M21LB01
L17CA30M21LB2
L17CA30M21LE
L17CA30T21LA
L17CA30T21LD
L17CA30T21LE
L17CC25A
L17HP25E01A
L17HP25E51A
L17HP-K
L17HP-K\AU side
L17HP-K\Chi Mel
L17LA25M21LE-U01
L17SA25A
L17SA25A01
L17SA25E21AA
L17SA25E21AC
L17SA25E21LC
L17SA25M21LC
L17SA25T21LA
L17SA25T21LD01
L17SA30M21LE-U0
L17SA30M21LE-U01
L17SA30T21LA
L17SA30T21LD
L17SX25A
L17UA43A
L17UC43A
L18CA35M21LB
L19CMATB-U32 AD
L19FA25A21AA
L19FA25M21L
L19fa30
L19FA30A1
L19LA25GC
L19LA25M21LB
L19LA25M21LC01
L19LA25M21LC02
L19LA25M21LC03
L19LA25M21LD
L19LA25T21LC
L19LA25T21LC
L19LA25xx & L19MA25xx
L19LD25A
L19LD25A11
L19MA25
L19MA25A

L19MA25A01
 L19MA25A02
 L19MA25A03
 L19MA25A04
 L19MA25A05
 L19MA25A06
 L19MA25A1
 L19MA25A21A
 L19MA25A51AA
 L19MA25C01
 L19MA25E21AB
 L19MA25GA06
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 L19MA25M21LA
 L19MA25M21LA01
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 L19MA25M21LA03
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 L19MA25M21LC01
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 L19MA25M21LD IGT
 L19MA25M21LE
 L19MA25M21LH
 L19MA25M51LA
 L19MA25T21LA
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 L19MD25E21AB
 L19MD25E51AB
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 LC02
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 L19SD25A2
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 L19SD25E21AB01
 L19SD25E51AB
 L19SD25E51AB\update
 L19SD25E51AB01
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 L19YD25E21AB
 L19YD25E51AA

L19YD25E51AB
L19YD25E51AB\New Boards
L20AA25-DPI
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L20LA43M5W53A01
L26LA50M2W53A
L32MA55A
L37LD50A
L40SA50
L40SA50A
L42MA60A
L5CA25A21AJ
L5CA25C21L
L5CA25M21LJ
L5CDS
L5CDS-A21A
L5CDS-A21P
L5CDS-A31A
L5CDS-A51A
L5CDS-A51P
L5CDSB-A01A
L5CDSB-A21A
L5CDSB-A21P
L5CDSB-A51A
L5CDSB-A51P
L5CDSB-E21A
L5CDSB-E21P
L5CDSBH-A21A
L5CDSB-HM21L
L5CDSB-M21L
L5CDS-CLI
L5CDS-E21A
L5CDSH-M21L
L5CDSK
L5CDSKA
L5CDSK-A21P
L5CDSK-M21L
L5CDSKM21LB
L5CDSKM21LB-B
L5CDSKM21LD
L5CDSKM51L
L5CDSKM51LBZ
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L5CDSKR-A51A
L5CDSKR-A51P
L5CDSKRH
L5CDSKRH01
L5CDSKRH-A21A
L5CDSKRH-A21A
L5CDSKRH-A21P
L5CDS-M21L
L5CDS-M51L

L5CDS-U31
L5CDS-U32
L5CDS-U72
L5CDS-U82
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L5CES-A01A
L5CES-A21A
L5CES-A21P
L5CES-A51A
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L5CESB01
L5CESB02
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L5CESB-A21A
L5CESB-A21P
L5CESB-A31A
L5CESB-A51A
L5CESB-A51P
L5CESB-C21L / L5CES-C21L
L5CESB-C21LGT
L5CESB-C51L
L5CESB-E21A
L5CESB-E21P
L5CESB-E51A
L5CESB-E51P
L5CESB-HA21A
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L5CESBH-A21A-MS
L5CESBH-A51A
L5CESBH-C21L
L5CESBH-C21L-MS
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L5CESBH-M51L
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 L5CTS-KA21A
 L5CTS-KA50A
 L5CTS-KA51A
 L5CTS-KC21L
 L5CTS-KE21A
 L5CTS-KM01L
 L5CTSK-M21L /L5CTSK-
 M21L
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 L5CTS-R21L
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 L5MA25E21AJ
 L5MA25M21LA
 L5RA25A

L5RA25E2IAH
L5RA25E2IAJ
L5RA25E2IAJ01
L5RA25J
L5RA25-K
L5RA25M2ILA
L5RA25M2ILA01
L5RA25M2ILA1
L5RA25M2ILL
L5RA25M5ILK
L5RX25A
L5VHT
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L64LA25B
L64LA25B
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L64PA30A2
L64PA30A2IAA
L64PA30A5IAA
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L64PA30T2IAA
L64PA30AT2IA
L64PC30A
L7CESK
L7CMS
L7CMS-A2IA
L7CMS-A5IA
L7CMSB
L7CMSB-A2IA
L7CMSB-A3IA
L7CMSB-E2IA
L7CMSB-HA2IA
L7CMSB-HA5IA
L7CMSB-HE2IA
L7CMSB-HM01L
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L7CMSB-HM51L
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L7CMSH-A2IA
L7CMSH-E2IA
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L7CMSKM21L
L7CMS-M21L
L7CMS-M51L
L7CMS-U42
L7MA25M2ILA
L7MX25A

L7SA25A
lcd Open Frame Monitors
LD23HL
LD23HLO1
LD23HLO1-K
LD23HL-K
LD30HL
LD32HL
LK152FB
LK152FP
LK152FP1-M21L
LK152FPA51A
LK152FPE21A
LK152FPE21P
LK152FP-E51A
LK152FPM51L
LK152FPM51LI
LK152FR
LK152FRA21A
LK152FRA51A
LK152FR-E21A1
LK152FRM21L
LK152FRM51L
LK171FP-A21A
LK171FP-E21A
LK171FP-M21L
LK171FR
LK171FRA21A
LK171FRA51A
LK171FRE21A
LK171FRG
LK171FRM51L
LK172FP-M21L
LK192FR
LQ121-LH03-INV
LS10PA14 Medialand
LS10PA1421AA1 CVPS
LS12NA20
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P46D
P46T
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VT17TI-A21A-SPC
VT17TI-A51A-SPC
VT19725FM21LZ
VT19826M21IH1

Interrogatory No. 3.

Identify each type of visual display product (such as the Tatung L17AMTN monitor) manufactured, shipped, imported, sold, and/or offered for sale, in or to the United States, by or for you, since January 1, 2002.

First Supplemental Response:

Subject to and without waiver of the previously stated and present general and specific objections and in addition to our previous response, TATUNG USA states that, based upon information and belief, the following Tatung LCD computer monitors have been shipped, imported, sold, or offered for sale in the United States since January 1, 2002.

42 inch lcd ofm
DELPHI
ADMNLCD27
ADMNLCD30
ADMNPLASMA42
ADMNPLASMA46

ADMNPLASMA50
 DMAV-2701
 DMAV-3201
 DTV-29XRT
 HT12X21-210-INV
 L10PA35
 L10PA35A
 L10PA35A01
 L10PA35A21A
 L10PA35A51A
 L10PA35M21LA
 L10PC35A
 L12BA40A61AA
 L12BA40B
 L12RB25C21L-G
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 L15CA25
 L15CA25/15 CPT XP01
 L15CA25/COLOR FACTOR
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 SMI
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 L17ACTNB-UD2 AD

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L17CA30T21LD
L17CA30T21LE
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L17HP-K\AU side
L17HP-K\Chi Mei
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VT1771-A51A-SPC
VT19725FM2ILZ
VT19826M211H1


By way of further response, TATUNG USA states that the additional information necessary to respond to Interrogatories 2 and 3 is in Plaintiff's possession. TATUNG USA reserves the right to further supplement this and any other response.

As to Objections.

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Dated: October 20, 2006


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Attorneys for Defendant Tatung Company of
America Inc

As to the First Supplemental Answers to Interrogatories Numbers 2 and 3 of the Second Set of Interrogatories:

I declare under penalty of perjury that the foregoing is true and correct.

Tatung Company of America, Inc

Date: _____

Name

UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE

CERTIFICATE OF SERVICE

I hereby certify that on October 20, 2006, I caused to be served by hand delivery the foregoing document to the following:

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Wilmington, DE 19899

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Jaclyn M. Mason, Esquire
Connolly Bove Lodge & Hutz LLP
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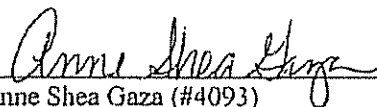
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David E. Moore, Esquire
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I hereby certify that on October 20, 2006, I have sent by Federal Express the foregoing document to the following:

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